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Washington, DC 20460



RE: Establishment of Electronic Reporting; Electronics Records; Proposed Rule;  
August 31, 2001; 66 FR 46162

My comments concerning COMMERRR based a review of available information:

1. The proposed COMMERRR concept requires totally comprehensive information capture, storage, retrieval and audit trail. This is transaction level reporting, not results level reporting.
2. The technologies to support the COMMERRR requirements do not appear to be commercially available in both sophistication and/or size.
3. The costs to develop the required transaction level reporting technologies are estimated to be very high.
4. It seems the results level (not transaction level) reporting is currently accomplished with a blend of the technologies currently in place. The cost of improving and exposing them at the transaction level would be better utilized to deliver "real" environmental improvements.
5. It is reasonable to assume many paper producers use electronic technologies, in addition to manual methods, to gather, store and report environmental data. Results from these data systems are reported per specific government agency requirements, by entity and measurement metrics. The data collection methods and technologies may vary, yet the results are uniformly reported. These various systems allow freedom for each company to select the most cost-effective levels of technology to meet the government's requirements. This freedom is a cornerstone of commercial success that supports a healthy industry.

Philosophically, it seems that any government regulating agency could be given legislative mandates to require reporting. This has been historically true. The burden of defining the particular data reporting elements perhaps belongs to the governing agencies. However, the COMMERRR is different in that it requires reporting at all transaction levels. COMMERRR does not simply define results reporting for environmental protection tracking.

I consider COMMERRR unreasonable and onerous. The comprehensive, transaction level reporting could damage the commercial viability of paper companies mandated to meet the proposed COMMERRR requirements. The program is deemed "voluntary", but the criteria for compliance are so broad that any modern business will be required to comply.



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